

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

EPIC SYSTEMS CORPORATION, a
Wisconsin Corporation,

Plaintiff,

Case No. 14-CV-748

v.

TATA CONSULTANCY SERVICES
LIMITED, an Indian Corporation; and TATA
AMERICA INTERNATIONAL
CORPORATION (dba TCS AMERICA), a
New York Corporation,

Defendants.

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR EXPEDITED DISCOVERY**

Plaintiff Epic Systems Corporation ("Epic") moves under Fed. R. Civ. P. 26(d) for an order to conduct limited discovery on an expedited basis. Expedited discovery is warranted so Epic can determine whether it must seek preliminary injunctive relief to immediately prevent Defendants' misuse of Epic's trade secret and confidential information wrongfully obtained by Defendants Tata Consultancy Services Limited and Tata America International Corporation (dba TCS America).

Epic filed its Complaint against Defendants on October 31, 2014, asserting multiple causes of action relating to Defendants' theft and misappropriation of Epic documents and information from Epic's computer network. Epic seeks permission to serve the following discovery immediately: (1) deposition notices to three Defendant employees who participated in the theft of Epic documents through wrongful access to Epic's computer network; (2) nine

document requests to Defendants regarding the theft of Epic's confidential information and subsequent use of that information in Defendants' competing medical software product; (3) a subpoena to a whistleblower that alerted Epic to TCS's misconduct; and (4) a subpoena for documents to Kaiser Foundation Hospitals (where TCS employees stole Epic's data while providing consulting services to Kaiser) regarding TCS's wrongful conduct and any investigation regarding that conduct.

Epic's motion is based on the attached Memorandum of Points and Authorities, the concurrently-filed Declarations of Stirling Martin, David P. MacLeod, and Nick G. Saros, the exhibits thereto, and the evidence and arguments that will be presented to the Court at the hearing on this matter.

Dated: November 6, 2014

/s/ Nick G. Saros

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